

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 1:05-cv-00697-SLR
	)	
BE&K ENGINEERING COMPANY	)	
(SUBSIDIARY OF BE&K, INC.),	)	
	)	
Defendant.	)	

Deposition of JUAN OBED PEREZ taken pursuant to notice at the law offices of Young, Conaway, Stargatt & Taylor, 1000 West Street, Wilmington, Delaware, beginning at 9:30 a.m., on Thursday, March 9, 2006, before Eleanor J. Schwandt, Registered Merit Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ., TRIAL ATTORNEY  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Philadelphia District Office - The Bourse  
111 S. Independence Mall East - Suite 400  
Philadelphia, Pennsylvania 19106-2515  
for the Plaintiff

MARGARET M. DIBIANCA, ESQ.  
YOUNG, CONAWAY, STARGATT & TAYLOR  
1000 West Street  
The Brandywine Building  
Wilmington, Delaware 19801  
for the Defendant

ALSO PRESENT:

DEBORAH L. COLES, Paralegal  
Young, Conaway, Stargatt & Taylor

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477



WILCOX & FETZER LTD.  
Registered Professional Reporters

COPY

MR. ANGLADE: I just want to note for the record that it has been calculated that we have been on the record for approximately five hours and fifteen minutes today.

(Proceedings conclude at 5:02 p.m.)

# I N D E X

<u>DEPONENT:</u>	<u>JUAN OBED PEREZ</u>	<u>PAGE</u>
Examination by Ms. DiBianca		2

# E X H I B I T S

<u>PEREZ DEPOSITION EXHIBITS</u>	<u>MARKED</u>
1 - Perez to Frazier letter	34
2 - BE&K Application for Employment	47
3 - 2/5/93 Rathje to Perez letter	48
4 - Perez resume	49
5 - Employment Requisition	63
6 - Perez resume	86
7 - 2/10/00 Abrams to Perez letter	98
8 - Perez resume	119
9 - Employment Requisition	126
10 - Recommendation for status change	140
11 - W-2 forms	144
11 - W-2 forms (remarked)	145
12 - Pay stubs	155

ERRATA SHEET/DEPONENT'S SIGNATURE PAGE 190

CERTIFICATE OF REPORTER PAGE 191



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT	)	
OPPORTUNITY COMMISSION,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 1:05-cv-00697-SLR
	)	
BE&K ENGINEERING COMPANY	)	
(SUBSIDIARY OF BE&K,	)	VOLUME II
INC.),	)	Pages 192-282
	)	
Defendant.	)	

Continuation of deposition of JUAN OBED PEREZ, taken pursuant to notice at the law offices of Young, Conaway, Stargatt & Taylor, 1000 West Street, Wilmington, Delaware, beginning at 8:14 a.m., on Monday, March 13, 2006, before Julie H. Parrack, Registered Merit Reporter, Certified Realtime Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQUIRE  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Philadelphia District Office - The Bourse  
111 S. Independence Mall East - Suite 400  
Philadelphia, Pennsylvania 19106-2515  
On behalf of Plaintiff

MARGARET M. DIBIANCA, ESQUIRE  
YOUNG, CONAWAY, STARGATT & TAYLOR  
1000 West Street  
The Brandywine Building  
Wilmington, Delaware 19801.  
On behalf of Defendant

ALSO PRESENT:

DEBORAH L. COLES, Paralegal  
Young, Conaway, Stargatt & Taylor

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477





Juan Obed Perez - Volume Two

280

1 opportunity now to do so.

2 A. No.

3 Q. Okay. And have you told me everything  
4 truthfully to the best of your recollection?

5 A. Yes.

6 MS. DiBIANCA: Okay, that's all I have.  
7 That's it.

8 MR. ANGLADE: Okay. I have no questions.

9 (The deposition concluded at 10:43 a.m.)

# 10 I N D E X

11 Deponent: JUAN OBED PEREZ

12 By Ms. DiBianca..... Page 11  
13 193 12

# 13 E X H I B I T S

14 Perez:

		<u>Page</u>	
15	13	Performance Planning Reviews	211 15
16		Bates Nos. EEOC 0130-131; 125-126; 120-121	16
17	14	Charge of Discrimination	242 17
18		Bates No. D3	18
19	15	Employment Termination Questionnaire	245 19
20		Bates Nos. EEOC 0046-55	20

21 - - - - - 21



22  
23  
24  
WILCOX & FETZER LTD.  
Registered Professional Reporters

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 1:05-cv-00697-SLR
	)	
BE&K ENGINEERING COMPANY	)	
(SUBSIDIARY OF BE&K, INC.),	)	
	)	
Defendants.	)	

Deposition of DANIEL M. DAYTON taken pursuant to notice at the law offices of Young Conaway Stargatt & Taylor, 1000 West Street, 17th Floor, Wilmington, Delaware, beginning at 9:12 a.m. on Tuesday, May 9, 2006, before Lucinda M. Reeder, RDR, CRR and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ.

Equal Employment Opportunity Commission  
Philadelphia District Office  
21 South 5th Street, Suite 400  
Philadelphia, Pennsylvania 19106  
for the Plaintiff

MARGARET M. DiBIANCA, ESQ.

Young Conaway Stargatt & Taylor  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801  
for the Defendant

ALSO PRESENT:

NORMAN D. GRIFFITHS

DuPont Legal  
Chestnut Run Plaza 728/2225  
974 Centre Road  
Wilmington, Delaware 19805

WILCOX & FETZER, LTD.

1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477  
www.wilfet.com



WILCOX & FETZER LTD.  
Registered Professional Reporters



1 A. For the work that Mr. Perez was doing, yes.

2 Q. And would that training have been equally  
3 applicable to the equipment documentation project?

4 A. Yes.

5 MS. DiBIANCA: That's all I have.

6 MR. ANGLADE: Okay.

7 (Deposition concluded at 10:56 a.m.

8 -- -- -- --

9 I N D E X

10	WITNESS: DANIEL M. DAYTON	PAGE
11	EXAMINATION BY MS. DiBIANCA	2
	EXAMINATION BY MR. GRIFFITHS	16
12	EXAMINATION BY MS. DiBIANCA	17
	EXAMINATION BY MR. GRIFFITHS	18
13	EXAMINATION BY MS. DiBIANCA	18
	EXAMINATION BY MR. GRIFFITHS	24
14	EXAMINATION BY MS. DiBIANCA	24
	EXAMINATION BY MR. ANGLADE	37
15	EXAMINATION BY MS. DiBIANCA	67
	EXAMINATION BY MR. ANGLADE	69
16	EXAMINATION BY MS. DiBIANCA	71

17 E X H I B I T S

18	NO.	MARKED
19	1 Series of e-mails produced by DuPont	3

20

21

22

23

24

